ID: CCA-123115-09 Number: **200910052** Release Date: 3/6/2009

Office:

UILC: 6331.18-00

From:

**Sent:** [Friday, January 23, 2009 11:57 AM]

To: Cc:

**Subject:** [RE: legal question]

No. The taxpayer doesn't have any property rights until he/she actually wins. So the RO would have to hang out at the casino the whole time or hope he/she times it right. Do we know the source of the funds taxpayer is using to participate? We may want to levy that.